

Memorandum In Support of This Lawsuit For Violation of Civil Rights / Inhumane Conditions as a Pretrial Detainee

Adonis Holman is initiating this lawsuit due to my Civil Rights being violated / abused, and inhumane conditions. I am forced to live in here at this beleaguered Cuyahoga County Jail. I am in pretrial detention and not what so ever a disciplinary oriented human being nor a threat to the jail administration. Conditions I am experiencing and exposed to which have been verified by a recent Federal inspection consist of listed by category are as follows:

Food Service / Personal Safety:

- 1) We are forced to eat off of moldy trays
- 2) We are forced to eat off plastic spoons that do not get replaced on a regular basis
- 3) Food Service - Excessive mold in the dish room, dry storage / cold storage which consist of outdated food in some areas

Legal:

- 1) No responses from administration to Kites and grievances which contradicts the proper procedure which is stated in the inmate handbook
- 2) Administration/staff tampering with legal mail and legal resources
- 3) Recorded conversation through phones during attorney visits
- 4) No response from Angela Curtis at the Cuyahoga County Jail who represents the government agency "Department of Children + Family Services"

Medical:

- 1) Neglect to treat inmates with proper procedure as stated in the inmate handbook
- 2) False response from inmate request forms to avoid proper medical attention
- 3) Neglect to schedule proper medical appointments

Physical/Mental Abuse:

- 1) Neglect to pass out razors for personal hygiene/Neglect monthly haircuts

Within or about the month of November 2018 the U.S. Marshalls conducted an in depth investigation that found a wide spread Civil Rights abuses and inhumane conditions inside the Cuyahoga County Corrections Center. Its clear that these deplorable conditions have been festering for years. Adonis Holman has been incarcerated here since admission date September 22, 2018, which verifies that I have and continue to suffer daily through these conditions. I am requesting peace, justice, and compensation to resolve these problems.

Thank you For Your Time and Concern

Respectfully Submitted,
Adonis Holman #0313527

Adonis Holman

P.O. Box 5600

Cleveland, OH 10. 44101